

Arizona SFY18 EOY Assessment Highlights and Concerns

DRAFT

Administration

Highlights:

1. Federal grants: ADEQ receives ~\$5.6M in water program grants and ~\$3.7M from State Revolving Funds, which accounts for 25% of ADEQ's Water Division operating budget.
 - a. PPG combines CWA 106, PWSS, and NPS funds.
2. ~110 FTE, 61 are federally funded positions.
3. ADEQ and EPA participated in a PPG Kaizen event, which resulted in a new multi-media PPG and workplan for SFY19-20. After 20 years, the Water-only PPG has come to an end. This is our final Water-only PPG end of year.

Water Quality Standards

Highlights:

1. ADEQ hired a section manager to oversee WQS and assessment.
2. New Triennial Review process has begun and will be submitted to EPA in [insert quarter] 2019.
3. ADEQ continues to move forward on developing numeric nutrient criteria. Region 9 continues to work with N-STEPS in seeking funds to support this effort.

Concern:

1. EPA has had little time to provide input to standards documents prior to general public notification. Early engagement between ADEQ and EPA per the Performance Partnership Agreement will support ADEQ's efficiency, efficacy, and responsiveness goals.

Monitoring

Highlights:

1. National Rivers and Streams Assessment sampling will be done by contractor, instead of ADEQ staff.
2. ADEQ continues to engage with citizen science and monitoring organizations, building community monitoring capacity within the state.

Concerns:

1. ADEQ's FY19 Sampling and Analysis Plan (SAP), generated in FY18, places the priority on monitoring to delist waterbodies only, rather than 305(b) and 303(d) requirements to assess waterbodies on a statewide basis.
2. The probabilistic ambient monitoring design appears to have been dropped from the FY19 SAP.

Assessment and TMDL

Highlights:

1. EPA issued partial approval and partial disapproval of 303(d) list in September 2018.
2. Re-alignment of Surface Water Section to focus on certain watersheds will support ongoing Upper San Pedro TMDL and Clean Water Partnership development.

3. ADEQ updated its 2016 Integrated Report records in ATTAINS in anticipation of its 2018 submission to the system.

Concerns:

1. Progress on Pinto and Queen Creek TMDLs has been slowed due to both resource constraints and challenges from the regulated community.
2. AZ Assessment Calculator is still not functioning, which prevented ADEQ from assessing waters for new impairments with ADEQ 2015-2017 monitoring data.
3. In the 2018 Integrated Report, ADEQ was unable to include public data due to data formatting and a failed assessment calculator. The 2016 Integrated Report did not include public data due to formatting issues as well.

NPDES

Highlights:

1. Met 90% current permits target.
2. Successfully reissued 2 long-backlogged permits.
3. Initiated improvements to mixing zone policy.
4. Expanded myDEQ interface to allow for electronic permitting of additional general permits.

Concerns:

1. Continued delayed reissuance of the MSGP and Phase I MS4 permits, as well as four other general permits scheduled to be reissued in SFY18. It is important that ADEQ make progress and issue the MSGP per the grant condition deadline of January 2019 to continue to maintain their success in meeting the 90% permits current target.

Nonpoint Source

Highlight:

1. Good news! The long term Nonpoint Source effort at Hillside Mine is showing promise with preliminary results at 36% reduction in Zinc, where 30% had been predicted.

Concern:

1. The Upper Santa Cruz River is a priority for EPA and we would like to work with ADEQ to move this watershed towards restoration.

604(b)

1. ADEQ is reevaluating their process for awarding 604(b) grant funds.

Wetlands and 401

1. Continued interagency coordination as a result of the continued grant condition.

Border

[Not provided]

Clean Water Enforcement and Compliance

Highlights:

1. Exceeded several inspection targets, increased non-routine inspections in response to citizen complaints, and began sanitary sewer system inspections.
2. Met the final portion of the grant condition deadlines for e-reporting.
3. Maintained the number of enforcement actions comparable to SFY17 levels.
4. The number of facilities in significant noncompliance remains significantly reduced.

Concern:

1. Not all general permits are in ICIS, as required by E-reporting Rule Phase I.

PWSS

Highlights:

1. >99% of drinking water operators are certified at the appropriate level in the State.
2. ADEQ returned to compliance 31 PWSs including addressing systems with lead ALEs under its Small Water System Compliance Assistance Plan.

Concerns:

1. There has been no progress to date on addressing the backlog of 19 primacy packages, although ADEQ committed to submitting 3 packages in FY18.
2. ADEQ is not reporting significant deficiency violations or tracking of public notices.
3. ADEQ does not have a timeframe for when they will complete an oversight review of PWSS program element delegated to the counties.

Source Water Protection

Highlights:

1. SWP Program achieved its targets (6 SWP plans, 6 UST reviews, 23 outreach events) despite having to dedicate significant resources to PFOA/S and UCMR4.
2. Program continued to coordinate with ADEQ CWA Programs; and completed the PFOA/S Sampling Project.

Groundwater

Highlights:

1. ADEQ is moving forward on developing a UIC program and seeking program primacy.
2. Continued coordination on APP/UIC permits (e.g., Excelsior and Florence Copper) and ADEQ drywell updates for EPA's Class V inventory.

Drinking Water Enforcement

Highlights:

1. Coordination and communication efforts between EPA and ADEQ have been very good.
2. The number of systems on the ETT list has gradually decreased in the past four quarters.
3. ADEQ continues to be responsive to tips/complaints received via EPA's national tip line.
4. EPA and ADEQ will continue discussions regarding clearly defined compliance schedules and return to compliance deadlines.